UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

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ANGEL RODRIGUEZ, Individually and as the representative of a class of similarly situated persons,

Case No. 1:20-cv-2806-LDH-PK

Plaintiff,

- against -

JRCIGARS.COM, INC.,

NOTICE OF SETTLEMENT

Defendants.

Now comes the Plaintiff, Angel Rodriguez, by and through counsel, to provide notice to the Court that the present cause has been settled between the parties, and states:

- 1. The parties have reached an agreement and a settlement agreement ("Agreement") is in the process of being finalized. Once the Agreement is fully executed, and the terms have been fulfilled, the Parties will submit a Notice of Voluntary Dismissal with prejudice pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(i) and will request that the Court retain jurisdiction of the matter during the Remediation Period identified in the Agreement.
- 2. The parties respectfully request that the Court stay this case and adjourn all deadlines and conferences.
- 3. We respectfully request the Court provide that the parties may seek to reopen the matter for forty-five (45) days to assure that the Agreement is executed and that the settlement funds have cleared.

Dated: Scarsdale, New York July 31, 2020

SHAKED LAW GOUP, P.C. Attorneys for Plaintiff

By: /s/Dan Shaked

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